

# **Exhibit A**

**COMPARISON OF PROPOSED SCHEDULING ORDERS**

	<b><u>EVENT</u></b>	<b><u>DEFENDANT PROPOSAL</u></b>	<b><u>CLASS PROPOSAL</u></b>	<b><u>DAP PROPOSAL</u></b>
1	First day on which third set of RFPs and other written discovery requests may be served.	<b>June 24, 2025 (Tues)</b>		
2	<p>Deadline for proposals to the Court regarding whether or not to have tracks/bellwethers for discovery and trials, and other matters concerning composition and timing of trial(s).</p> <p><i>If disagreement, letter briefs of no more than 5 pages per proposal (i.e., if Class, DAPs, and Defendants disagree with each other, three letter briefs total)</i></p>	<b>This deadline is not necessary or appropriate for the case schedule at this time.</b>	<b>This deadline is not necessary or appropriate for the case schedule at this time.</b>	<b>July 3, 2025 (Thurs)</b>
3	Production of structured data samples (at least 50 lines)	<b>July 24, 2025 (Thurs)</b>  Limited to structured data field names previously provided pursuant to RFP 3	<b>July 24, 2025 (Thurs)</b>	<b>July 24, 2025 (Thurs)</b>

	<u><b>EVENT</b></u>	<u><b>DEFENDANT PROPOSAL</b></u>	<u><b>CLASS PROPOSAL</b></u>	<u><b>DAP PROPOSAL</b></u>
4	Deadline for defendants to produce materials produced in government investigations and/or other litigation, if permitted by Court	<b>This deadline is not necessary or appropriate for the case schedule at this time.</b>	<b>Class Plaintiffs agree that these materials should be prioritized, but believe this should be worked out through the meet and confer process.</b>	<b>August 4, 2025 (Mon)</b>
5	Answers and Counterclaims under FRCP 12 to Consolidated Class Action Complaint and Amended Consolidated Master Direct Action Plaintiff Complaint	<b>August 12, 2025 (Mon)</b>		
6	<p>Deadline for producing party's disclosure of initial list of its own proposed document custodians and custodial sources as to requests for which it agrees to produce documents [ESI Protocol V.A]</p> <p>Deadline to meet and confer regarding non-custodian document sources that the producing Party believes, based on its investigation to date, may reasonably be likely to contain unique information responsive to requests for</p>	<b>August 25, 2025 (Mon)</b>		

	<u><b>EVENT</b></u>	<u><b>DEFENDANT PROPOSAL</b></u>	<u><b>CLASS PROPOSAL</b></u>	<u><b>DAP PROPOSAL</b></u>
	<p>which it agrees to produce documents [ESI Protocol V.B]</p> <p>Deadline to meet and confer regarding (i) potential use and identification of search terms, tools, or techniques, (ii) use of technology assisted review or artificial intelligence (“TAR/AI”) in whole or part to cull any corpus of materials, and (iii) all parameters for scoping the review and production efforts (e.g., application of date ranges, custodians, non-custodial sources, etc.) for requests for which the producing party agrees to produce documents. [ESI Protocol V.E.1.a]</p>			
7	<p>By no later than 45 days after service of responses and objections to the third sets of requests for production, the Parties will: (a) submit a TAR/AI Protocol to the Court or (b) submit letter briefs of no more than 5 pages total for Plaintiffs and one letter brief of no more than 5 pages total for Defendants concerning any</p>			<p><b>September 8, 2025 (Mon)</b></p>

	<u><b>EVENT</b></u>	<u><b>DEFENDANT PROPOSAL</b></u>	<u><b>CLASS PROPOSAL</b></u>	<u><b>DAP PROPOSAL</b></u>
	disputes as to the TAR/AI Protocol. [from ESI Protocol Section E.2.a.]			
8	Deadline to submit agreed deposition protocol and agreement on number of fact depositions, or joint motion setting forth areas of dispute	<b>September 8, 2025 (Mon)</b>		
9	Joint status report and a proposed order concerning agreements on the scope and format of production of structured data or, if disagreement on the proposed order, Plaintiffs collectively may file a letter brief of up to 10 pages and Defendants collectively may file a letter brief of up to 10 pages.	<b>September 18, 2025 (Thu)</b>  57 days after submission of data samples  This joint status report and proposed order should also address the timing for production of structured data.	<b>August 18, 2025 (Mon)</b>  25 days after submission of data samples	<b>August 18, 2025 (Mon)</b>  25 days after submission of data samples
10	Deadline to complete search methodology negotiations and submit any remaining search term disputes relating to third set of RFPs. ESI Protocol Section V.E.3.e-f (page 27-28).	<b>October 22, 2025 (Wed)</b>  120 days after service of third set of RFPs	<b>September 12, 2025 (Fri)</b>	<b>September 12, 2025 (Fri)</b>
11	Deadline to complete production of structured data requested in Plaintiffs' and Defendants' Third Set of RFPs	<b>Deadline to be determined as per Row 9 (by the parties' agreement after meet and confer, or the</b>	<b>October 16, 2025 (Thurs)</b>	<b>October 16, 2025 (Weds)</b>

	<u><b>EVENT</b></u>	<u><b>DEFENDANT PROPOSAL</b></u>	<u><b>CLASS PROPOSAL</b></u>	<u><b>DAP PROPOSAL</b></u>
		<b>Court's resolution of any disputes, regarding the production of structured data).</b>	This deadline is necessary as many subsequent dates are contingent upon completion of data production.	This deadline is necessary as many subsequent dates are contingent upon completion of data production.
12	Deadline to complete production of documents from up to 5 priority custodians per party	N/A	N/A	<b>November 11, 2025 (Tues)</b>
13	Deadline for any motions to amend the pleadings	<b>January 21, 2026 (Weds)</b>		
14	Deadline regarding document productions in response to Third Set of RFPs	<b>April 9, 2026 (substantial completion) (Thu)</b>  290 days after service of third set of RFPs	<b>Dec. 12, 2025 (completion) (Fri)</b>  ~6 months from service of third set of RFPs	<b>December 12, 2025 (Fri) (completion)</b>  ~6 months from service of third set of RFPs
15	Last day on which parties may serve requests for production, with the exception of witness-specific requests for production directly related to scheduled depositions	<b>September 24, 2026 (Thu)</b>  ~75 days before close of fact discovery	<b>June 3, 2026 (Weds)</b>  ~75 days before close of fact discovery	<b>April 17, 2026 (Fri)</b>  ~75 days before close of fact discovery
16	Last day on which parties may serve interrogatories	<b>October 23, 2026 (Fri)</b>  ~45 days before close of fact discovery	<b>July 3, 2026 (Fri)</b>  ~45 days before close of fact discovery	<b>May 19, 2026 (Tue)</b>  ~45 days before close of fact discovery

	<b><u>EVENT</u></b>	<b><u>DEFENDANT PROPOSAL</u></b>	<b><u>CLASS PROPOSAL</u></b>	<b><u>DAP PROPOSAL</u></b>
17	Close of Fact Discovery	<b>December 8, 2026</b>  18 months after scheduling conference/order	<b>August 17, 2026 (Mon)</b>  14 months after June 17, 2025 status conference	<b>July 3, 2026 (Fri)</b>  13 months after denial of motion to dismiss
18	Class and DAP Plaintiffs' Opening Merits and Class Certification Expert Reports	<b>January 29, 2027</b>  45 days following close of fact discovery	<b>October 1, 2026 (Thurs)</b>  45 days following close of fact discovery	<b>August 17, 2026 (Mon)</b>  45 days following close of fact discovery
19	Defendants' Merits and Class Certification Opposition Expert Reports	<b>April 29, 2027</b>  90 days following opening reports)	<b>November 16, 2026 (Mon)</b>  45 days following opening reports	<b>October 1, 2026 (Thurs)</b>  45 days following opening reports
20	Class and DAP Plaintiffs' Rebuttal Expert Reports	<b>July 28, 2027</b>  90 days following opposition reports	<b>January 12, 2027 (Tues)</b>  45 days following opposition reports + 12 days for holidays	<b>November 16, 2026 (Mon)</b>  46 days following opposition reports
21	Close of Expert Discovery	<b>September 10, 2027</b>  44 days following rebuttal reports	<b>February 26, 2027 (Fri)</b>  45 days following submission of rebuttal reports	<b>January 6, 2027 (Wed)</b>  45 days following rebuttal reports (plus one week to account for holidays)

	<u><b>EVENT</b></u>	<u><b>DEFENDANT PROPOSAL</b></u>	<u><b>CLASS PROPOSAL</b></u>	<u><b>DAP PROPOSAL</b></u>
22	Class Certification Motion	<b>October 25, 2027</b>  45 days following close of expert discovery	<b>April 12, 2027 (Mon) [one round of <i>Daubert</i> for class/merits]</b>  45 days following close of expert discovery	N/A
23	Class Certification Opposition Brief	<b>December 9, 2027</b>  45 days following class cert motion	<b>May 27, 2027 (Thurs)</b>  45 days following submission of class cert motions	N/A
24	Class Certification Reply Brief	<b>January 23, 2028 (class certification only)</b>  45 days following oppositions	<b>July 26, 2027</b> Class Plaintiffs propose that <i>Daubert</i> reply briefs be due on July 12, 2027 with their class certification reply brief due 14 days later, on July 26, 2027. <i>See</i> Row 29.	N/A
25	Class Certification Hearing	Court's discretion	Court's discretion	Court's discretion
26	Summary Judgment Motions	90 days following class cert decision. Defendants also propose a second round of <i>Daubert</i> for merits experts.	<b>August 25, 2027 (Weds)</b>  30 days after class cert reply	<b>February 22, 2027 (Mon)</b> – (can be simultaneous with class certification motions or DAPs and Class proceed on separate schedules)



	<u><b>EVENT</b></u>	<u><b>DEFENDANT PROPOSAL</b></u>	<u><b>CLASS PROPOSAL</b></u>	<u><b>DAP PROPOSAL</b></u>
27	Summary Judgment Opposition Briefs	60 days following SJ/ <i>Daubert</i> motions	<b>September 24, 2027 (Fri)</b>  30 days after motions filed	<b>April 8, 2027 (Mon)</b> – (can be simultaneous with class certification motions or DAPs and Class proceed on separate schedules)
28	Summary Judgment Replies	30 days following SJ/ <i>Daubert</i> oppositions	<b>October 25, 2027 (Mon)</b>  30 days after oppositions	<b>May 24, 2027 (Mon)</b> – (can be simultaneous with class certification motions or DAPs and Class proceed on separate schedules)
29	<i>Daubert</i> Motions	<p>Defendants propose that <i>Daubert</i> motions as to class certification experts follow the exact same timeline as briefing on the class certification motion, set forth above.</p> <p>Defendants propose that <i>Daubert</i> motions as to merits experts follow the exact same timeline as briefing on the summary judgment motions.</p>	<p>Class Plaintiffs propose that there should be one period for briefing all <i>Daubert</i> motions (class and merits) as well as class certification followed by a separate period for briefing on summary judgment only. Class Plaintiffs propose that <i>Daubert</i> motions generally follow the same timeline as briefing on the class certification motion, as set forth above.</p>	DAPs propose that there can be one period for briefing on all <i>Daubert</i> , class certification, and summary judgment motions or DAPs and Class proceed on separate schedules.

	<u><b>EVENT</b></u>	<u><b>DEFENDANT PROPOSAL</b></u>	<u><b>CLASS PROPOSAL</b></u>	<u><b>DAP PROPOSAL</b></u>
30	Parties to submit joint status report or stipulation concerning (1) remand or transfer of cases centralized by Judicial Panel on Multidistrict Litigation, (2) deadlines for motions in limine briefing and evidentiary stipulations, and (3) deadlines for all remaining DAP actions	Court's discretion	Court's discretion	<b>June 23, 2027 (Mon.)</b>  30 days following completion of SJ briefing
31	Pre-Trial Conference	Court's discretion	Court's discretion	<b>Approximately September 21, 2027 (Tue.), depending on the Court's availability</b>  120 days following completion of SJ briefing.
32	First Trial Begins	Court's discretion	<b>Class Plaintiffs request that the Court set a firm trial date for the Class in late 2027.</b>	<b>Approximately October 5, 2027 (Tue.), depending on the Court's availability</b>  14 days after pre-trial conference